

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEJANDRO GARCIA ARANDA,
aka "valleyhoezzzz818,"
aka "valleyhoes818,"
aka "valleyhoezzzz818,"
aka "valleyhoezzzz818pt2,"
aka "valleyhoez818,"
aka "valleyhoezzzz818,"
aka "SFValley HOES,"
aka "VALLEY HOES,"
aka "THOTS,"
aka
"gettingridofvalleyhoodrats818,"
aka "Alex Arranda,"
aka "Alex aranda,"

Defendant.

CR No. 2:24-cr-00397-SB

I N D I C T M E N T

[18 U.S.C. §§ 2251(d), (e):
Advertisement of Child
Pornography; 18 U.S.C.
§§ 2252A(a)(2)(A), (b)(1):
Distribution of Child
Pornography; 18 U.S.C. § 875(d):
Transmitting Threatening
Communications with Intent to
Extort; 18 U.S.C. §§ 2253 and
981(a)(1)(C) and 28 U.S.C.
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Instagram was an online social media and networking
service, operating in interstate and foreign commerce, and owned by

1 Meta Platforms, Inc. Instagram allowed users to upload media that
2 could be edited with filters, organized by hashtags (#), and
3 facilitated the sharing of other identified users by their social
4 media handles (@). Instagram also allowed a user to post a biography
5 of up to 150 characters on the user's profile page. Instagram also
6 had direct messaging capability where one user could contact another
7 directly. Finally, Instagram also had a feature called "Stories,"
8 which allowed users to take photographs, to add effects and layers,
9 and to share this content with followers for only 24 hours.
10 Photographs or videos posted to a user's story generally disappeared
11 after 24 hours.

12 2. Cash App, PayPal, Venmo, and Zelle were mobile payment
13 services, operating in interstate and foreign commerce, that allowed
14 users to transfer money to one another using a mobile phone
15 application.

16 3. MEGA was a file hosting service, operating in interstate
17 and foreign commerce, and owned by MEGA CLOUD SERVICES LIMITED, a
18 company based in Auckland, New Zealand.

19 4. Defendant ALEJANDRO GARCIA ARANDA, also known as ("aka")
20 "valleyhoezzzz818," aka "valleyhoes818," aka "valleyhoezzzz818," aka
21 "valleyhoezzzz818pt2," aka "valleyhoez818," aka "valleyhoezzzz818,"
22 aka "SFValley HOES," aka "VALLEY HOES," aka "THOTS," aka
23 "gettinggridofvalleyhoodrats818," aka "Alex Arranda," aka "Alex
24 aranda," registered and used the Instagram handle "valleyhoezzzz818"
25 and included the following bio: "Exposing all valley hoers with their
26 @'s beware you may see yo girl on here (SHOUT OUT TO GET ACCEPTED)
27 IFYK OUR BACK UP THEN YOU KNOW."
28

1 5. Using the Instagram account "@valleyhoezzz818," as well as
2 others, defendant ARANDA would obtain, advertise, offer to sell, and
3 disseminate sexually explicit content of his victims - focusing on
4 local girls who attended schools in the San Fernando Valley.

5 6. Using Cash App, PayPal, Venmo, and Zelle, defendant ARANDA
6 would receive payments from customers who wanted to obtain sexually
7 explicit content of the victims that he had advertised and offered to
8 sell on the Instagram account "@valleyhoezzz818."

9 7. After receiving and confirming payment, using the Instagram
10 account "@valleyhoezzz818," defendant ARANDA would send a direct
11 message to the customer and provide a link to a zip file stored on
12 MEGA containing the sexually explicit photographs of his victims.

13 8. When victims who discovered that sexually explicit
14 materials depicting them were being advertised and disseminated by
15 defendant ARANDA, and requested defendant ARANDA to stop and remove
16 them, defendant ARANDA would attempt to extract further additional
17 sexually explicit material from the victim.

18 9. These Introductory Allegations are re-incorporated in every
19 count of this Indictment.

COUNT ONE

[18 U.S.C. §§ 2251(d), (e)]

Beginning on or about April 1, 2020, and continuing until at least May 26, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEJANDRO GARCIA ARANDA, also known as ("aka") "valleyhoezzzz818," aka "valleyhoes818," aka "valleyhoezzzzzz818," aka "valleyhoezzzzzz818pt2," aka "valleyhoez818," aka "valleyhoezzzzzz818," aka "SFValley HOES," aka "VALLEY HOES," aka "THOTS," aka "gettinggridofvalleyhoodrats818," aka "Alex Arranda," aka "Alex aranda," knowingly made, printed, and published, and caused to be made, printed, and published, a notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction whose production involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), and which visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be and was transported using any means and facility of interstate and foreign commerce, including by Instagram, and in and affecting interstate and foreign commerce by any means, including by computer.

COUNT TWO

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about May 11, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEJANDRO GARCIA ARANDA, also known as ("aka") "valleyhoezzzz818," aka "valleyhoes818," aka "valleyhoezzzz818," aka "valleyhoezzzz818pt2," aka "valleyhoez818," aka "valleyhoezzzzzz818," aka "SFValley HOES," aka "VALLEY HOES," aka "THOTS," aka "gettinggridofvalleyhoodrats818," aka "Alex Arranda," aka "Alex aranda," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, namely, a cell phone and the internet, and which had been shipped and transported in and affecting interstate and foreign commerce by any means, including by cell phone and the internet, knowing that the files were child pornography.

The child pornography that defendant ARANDA knowingly distributed included the following:

2020-04-24 19.09.53.mov,

2020-03-29 16.20.55.mov,

2020-05-01 01.10.52.mov, and

2020-03-31 21.17.50.jpg.

COUNT THREE

[18 U.S.C. § 875(d)]

On or about April 9, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEJANDRO GARCIA ARANDA, also known as ("aka") "valleyhoezzzz818," aka "valleyhoes818," aka "valleyhoezzzz818," aka "valleyhoezzzz818pt2," aka "valleyhoez818," aka "valleyhoezzzzzz818," aka "SFValley HOES," aka "VALLEY HOES," aka "THOTS," aka "gettingridofvalleyhoodrats818," aka "Alex Arranda," aka "Alex aranda," with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly and with the intent to extort a thing of value, transmitted in interstate and foreign commerce a communication containing a true threat to injure the property and reputation of another, that is, messages to a victim via Instagram Direct Messenger that threatened to post additional sexual content depicting the victim, including:

- "Pop a tit and I'll take it if rn,"
- "I'll just post the other stuff I have then,"
- "Ima have to just repost it and post more stuff about you then,"
- "That's not how it works idgaf how much you beg I told you what to do you lost your chance,"
- "I'll post more of you in a bit Just look for it," and
- "you had your chance."

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 2253]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 2253, in the event of the defendant's conviction of the offenses set forth in any of Counts One or Two of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following property:

(a) All right, title, and interest in any visual depiction involved in any such offense, or any book, magazine, periodical, film videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received and involved in any such offense;

(b) All right, title, and interest in any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense;

(c) All right, title, and interest in any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property; and

(d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), and (c).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), the defendant, if so convicted, shall forfeit substitute property, up to

1 the total value of the property described in the preceding paragraph
2 if, as the result of any act or omission of the defendant, the
3 property described in the preceding paragraph, or any portion
4 thereof: (a) cannot be located upon the exercise of due diligence;
5 (b) has been transferred, sold to or deposited with a third party;
6 (c) has been placed beyond the jurisdiction of the court; (d) has
7 been substantially diminished in value; or (e) has been commingled
8 with other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offense set forth in Count Three of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

//


//

1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3
4 A TRUE BILL

5 /s/
6 _____
Foreperson

7 E. MARTIN ESTRADA
8 United States Attorney

9 
10
11

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

12 JOSHUA O. MAUSNER
13 Assistant United States Attorney
14 Chief, Violent and Organized
Crime Section

15 KATHY YU
16 Senior Litigation Counsel
Assistant United States Attorney
Violent & Organized Crime Section